

## BY MAIL

**FILED**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

Case No. 4:12-CV-2070 JCH

Plaintiff Ronald Jordan, appearing pro se, files his Trial Brief.

Plaintiff, a prisoner in the Missouri Department of Corrections (MDOC), is currently incarcerated at the Potosi Correctional Center (PCC). Plaintiff has brought this action under 42 U.S.C. § 1983 seeking monetary and declaratory relief for violations of his rights under the United States Constitution. Plaintiff has alleged that his federal constitutional rights were violated by Defendant Hall.

Page 1 of 3

retaliation for Plaintiff's filing of numerous internal grievances against Defendant Hall.


II. Factual Issues

The primary factual issue is whether the acts of issuing Plaintiff a false disciplinary charge, trashing Plaintiff's cell on more than one occasion, improperly confiscating and destroying Plaintiff's personal property, conducting an unnecessary cell search during which dangerous contraband was allegedly found, were retaliatory. That the aforesaid acts were improperly performed and inconsistent or outside the guidelines set by the MDOC, serves to belie any notion of legitimacy and good faith.

III. Legal Issues

The primary legal issues will be whether Defendant Hall violated Plaintiff's First Amendment right to file grievances using the prison's established procedures by retaliating against Plaintiff when Plaintiff filed numerous grievances against Defendant Hall. The questions will be whether Plaintiff engaged in a protected activity; whether Defendant Hall took adverse action against Plaintiff that would chill a person of ordinary firmness from continuing the activity; and whether the adverse action was motivated at least in part by the exercise of the protected activity. Spencer v. Jackson County Mo., 738 F.3d 907, 911 (8th Cir. 2013).

Respectfully submitted,

  
RONALD JORDAN, Plaintiff  
Reg. No. 158420  
Potosi Correctional Center  
11593 State Highway 0  
Mineral Point, MO. 63660

CERTIFICATE OF SERVICE

The undersigned hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this 1<sup>st</sup> day of June, 2015, to:

Katherine S. Walsh  
Assistant Attorney General  
Old Post Office Building  
P.O. Box 861  
St. Louis, MO. 63188

(ATTORNEY FOR DEFENDANTS)

Ronald Jordan

Mr. Ronald Jordan, #158420 (5B-05)  
Potosi Correctional Center  
11593 State Highway 0  
Mineral Point, MO. 63660

SAINT LOUIS MO 630

03 JUN 2015 PM 6 L



This correspondence is from an inmate in the custody of the Missouri Department of Corrections. The Department is not responsible for the content of this correspondence. For information about the Department or to verify information about the offender, please visit our website at [www.doc.mo.gov](http://www.doc.mo.gov).

**MAILED FROM  
POTOSI  
CORRECTIONAL CENTER**

CLERK of Court  
U.S. District Court  
Eastern District of Missouri  
111 S. Tenth Street  
St. Louis, MO. 63102

**RECEIVED**  
JUN 05 2015  
**BY MAIL**

63102112325

